

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

VINCENT LAWRENCE,
Plaintiff,

v.

KALM FINANCIAL INC. ET AL

Defendant.

Civil Action No. 1:24-cv-11493- ADB

FILED
2025 JUL 3 11:06:50
U.S. DISTRICT COURT
DISTRICT OF MASSACHUSETTS

**PLAINTIFF VINCENT LAWRENCE'S
PARTIAL MOTION FOR SUMMARY JUDGMENT**

(Counts II–V – Liability Only)

Plaintiff Vincent Lawrence hereby files this Partial Motion for Summary Judgment on the limited issue of liability against Defendant Turbo Debt LLC. Because the undisputed material facts show that Plaintiff has met all elements of Counts II through V of the governing Second Verified Amended Complaint, Plaintiff respectfully seeks judgment in his favor on these claims.

In further support of this Motion, Plaintiff relies on the accompanying:

1. Memorandum of Law,
2. Statement of Undisputed Material Facts,
3. Affidavit of Vincent Lawrence,
4. Exhibit 1 – Plaintiff's Telephone Bills, and

5. CD Recording (referenced at Docket No. 24).

Plaintiff requests a judgment in his favor on liability under Counts II–V, reserving the issue of damages and Count I for subsequent summary judgment after discovery. Count I pertains to violations of the Telephone Consumer Protection Act, 47 U.S.C. § 227(b)(1)(A), for calls placed using an automatic telephone dialing system, and the Massachusetts Telemarketing Sales Act, M.G.L. c. 159C et seq.

Respectfully submitted,

Filed: June 30, 2025

Vincent Lawrence /s/ Vincent Lawrence

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Pro Se Plaintiff

CERTIFICATE OF SERVICE

I Vincent Lawrence the Plaintiff hereby certify, under the penalties of perjury, that on this date of June 30, 2025, I have made service of a copy of the following document(s) to the defendants attorneys listed below by email and first class mail.

Vincent Lawrence

/s/ Vincent Lawrence

June 20, 2025

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